

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

UNITED STATES OF AMERICA,

V.

FILED UNDER SEAL

CRAIG BOLLAND

FILED

August 2, 2023

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

DEFENDANT(S).

INDICTMENT

3:23-cr-00238-VC

18 U.S.C. § 922(a)(1)(A) – Manufacturing and Dealing Firearms Without a License;
18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm;
18 U.S.C. § 922(k) – Possession of a Firearm with Obliterated Serial Number;
18 U.S.C. § 922(o) – Possession of a Machinegun;
18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c) – Forfeiture Allegation

A true bill.

/s/ Foreperson of the Grand Jury

Foreman

Filed in open court this 2nd day of

August, 2023.

8/2/2023

Clerk

8/2/2023

Bail, \$ Warrant

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

FILED

August 2, 2023

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION **FILED UNDER SEAL**

UNITED STATES OF AMERICA,)	CASE NO. 3:23-cr-00238-VC
Plaintiff,)	<u>VIOLATION:</u>
v.)	18 U.S.C. § 922(a)(1)(A) – Manufacturing and
)	Dealing Firearms Without a License;
CRAIG BOLLAND,)	18 U.S.C. § 922(g)(1) – Felon in Possession of a
Defendant.)	Firearm;
)	18 U.S.C. § 922(k) – Possession of a Firearm with
)	Obliterated Serial Number;
)	18 U.S.C. § 922(o) – Possession of a Machinegun;
)	18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c) –
)	Forfeiture Allegation
)	SAN FRANCISCO VENUE

INDICTMENT

The Grand Jury charges:

COUNT ONE: (18 U.S.C. § 922(a)(1)(A) – Manufacturing and Dealing Firearms Without a License)

Beginning on or about June 1, 2021, and continuing through on or about May 30, 2023, in the Northern District of California, the defendant,

CRAIG BOLLAND,
not being a licensed manufacturer and dealer of firearms within the meaning of Title 18, United States Code, Chapter 44, did willfully engage in the business of manufacturing and dealing in firearms, in

INDICTMENT

violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT TWO: (18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm)

On or about May 30, 2023, in the Northern District of California, the defendant,

CRAIG BOLLAND,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, namely one black Glock brand model 19 9mm caliber pistol bearing serial number BFZC799, and one black IWI brand model Masada 9mm caliber pistol bearing serial number M1035732, and the firearm was in and affecting interstate commerce, all in violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE: (18 U.S.C. § 922(k) – Possession of a Firearm with Obliterated Serial Number)

On or about May 30, 2023, in the Northern District of California, the defendant,

CRAIG BOLLAND,

knowingly possessed a firearm, that is one black Intratec TEC-9 9mm caliber pistol, that had been shipped and transported in interstate commerce, from which the manufacturer's serial number had been removed, altered, and obliterated, in violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

COUNT FOUR: (18 U.S.C. § 922(o) – Possession of a Machinegun)

On or about May 30, 2023, in the Northern District of California, the defendant,

CRAIG BOLLAND,

did knowingly possess a machinegun, that is, one black Glock brand model 19 9mm caliber pistol bearing serial number BFZC799 and one black AR-15 style 5.56mm caliber rifle bearing no serial number, in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

FORFEITURE ALLEGATION: (18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

The allegations contained in Counts One through Four of this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses set forth in this Indictment, the defendant,

CRAIG BOLLAND,

1 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28,
 2 United States Code, Section 2461(c), any firearm and ammunition involved in the commission of the
 3 offenses, including, but not limited to, the following property seized from the defendant's residence on
 4 May 30, 2023:

- 5 a. One Glock brand, model 19, 9mm caliber pistol, bearing serial number BFZC799;
- 6 b. One Intratec brand, model TEC-9, 9mm caliber pistol, bearing no serial number;
- 7 c. One AR-15 style, 5.56mm caliber rifle, bearing no serial number;
- 8 d. One IWI brand, model Masada, 9mm caliber pistol, bearing serial number
- 9 M1035732;
- 10 e. One AK-47 style, 7.62mm caliber rifle, bearing serial number 16382;
- 11 f. One Polymer 80 Incorporated Model PF940V2 (frame), .40 caliber pistol, with Glock
- 12 22 barrel and slide, bearing serial number PDM876;
- 13 g. Any and all ammunition seized in or with the above firearms, including rifle and
- 14 pistol ammunition;
- 15 h. Any and all firearms parts seized with the above firearms, including slides, bolts,
- 16 receivers, frames, grips, rails, jigs, buttstocks, and buffer-tubes; and
- 17 i. Any and all firearms manufacturing equipment seized with the above firearms,
- 18 including 3D printers, hydraulic presses, drill presses, and one Ghost Gunner 3.

19 If any of the property described above, as a result of any act or omission of the defendant:

- 20 a. cannot be located upon exercise of due diligence;
- 21 b. has been transferred or sold to, or deposited with, a third party;
- 22 c. has been placed beyond the jurisdiction of the court;
- 23 d. has been substantially diminished in value; or
- 24 e. has been commingled with other property which cannot be divided without
- 25 difficulty,

26 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
 27 United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

28 //

1 All pursuant to Title 18, United States Code, Section 924(d), Title 28, United States Code,
2 Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

3
4 DATED: August 2, 2023

A TRUE BILL.

5
6 /s/ Foreperson
FOREPERSON
San Francisco, CA

7
8 ISMAIL J. RAMSEY
United States Attorney

9
10 /s/ George O. Hageman
11 GEORGE O. HAGEMAN
Assistant United States Attorney

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED
 Ct 1 – 18 U.S.C. § 922(a)(1)(A) – Manufacturing and Dealing Firearms Without a License; Ct 2 – 18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm; Ct 3 – 18 U.S.C. § 922(k) – Possession of a Firearm with Obliterated Serial Number; Ct 4 – 18 U.S.C. § 922(o) – Possession of a Machinegun
 18 U.S.C. § 924(d), 28 U.S.C. § 2461(c) – Forfeiture Allegation

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

 PENALTY: Ct 1: 5 years prison, \$250,000 fine, 3 years S.R., \$100 S.A., forfeiture
 Ct 2: 15 years prison, \$250,000 fine, 3 years S.R., \$100 S.A., forfeiture
 Ct 3: 5 years prison, \$250,000 fine, 3 years S.R., \$100 S.A., forfeiture
 Ct 4: 10 years prison, \$250,000 fine, 3 years S.R., \$100 S.A., forfeiture

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.**FILED UNDER SEAL**

▶ Craig Bolland

DISTRICT COURT NUMBER

3:23-cr-00238-VC

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Bureau of Alcohol, Tobacco, Firearms & Explosives

☒ person is awaiting trial in another Federal or State Court, give name of court

San Francisco Superior Court

☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a pending case involving this same defendant
MAGISTRATE
CASE NO.
☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under
IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1)
- ☐
- If not detained give date any prior summons was served on above charges ▶
-
- 2)
- ☐
- Is a Fugitive
-
- 3)
- ☐
- Is on Bail or Release from (show District)

IS IN CUSTODY

- 4)
- ☐
- On this charge
-
- 5)
- ☐
- On another conviction
-
- 6)
- ☒
- Awaiting trial on other charges

 If answer to (6) is "Yes", show name of institution
 SF County Jail 2

 Has detainer been filed? ☐ Yes ☒ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

FILED

August 2, 2023

 Mark B. Busby
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO

☐ Federal ☒ State

Name and Office of Person

Furnishing Information on this form Ismail J. Ramsey

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

George O. Hageman, AUSA

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments: